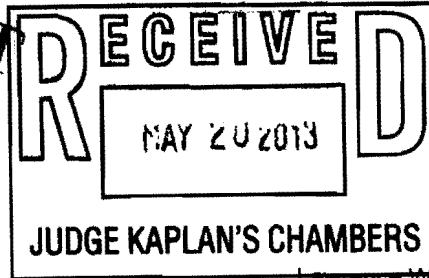


**Brownstein Hyatt  
Farber Schreck**

**DOCKET**

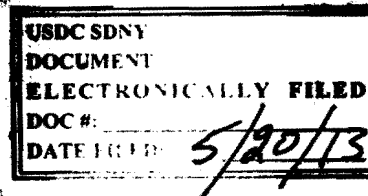


May 17, 2013

Lawrence W. Treece  
Attorney at Law  
303.223.1257 tel  
303.223.8057 fax  
ltreece@bhfs.com

**VIA COURIER & FEDERAL EXPRESS**

The Honorable Lewis A. Kaplan  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007



**RE: *Chevron Corp. v. Donziger*, 11 Civ. 0691 (LAK); Statement of Non-Party Brownstein Hyatt Farber Schreck, LLP Re: Plaintiff Chevron's Motion to Compel Production of Privileged Documents and Deposition of John V. McDermott.**

Dear Judge Kaplan:

I apologize for writing again, particularly so soon, but I thought this necessary to avoid confusion to both the Court and the parties. I received a copy of the parties' agreement regarding the subpoena served on Brownstein, and the Court's Order of May 17, 2013 issued pursuant to that agreement ("May 17 Order"), after I sent my first letter. This is to inform the Court and the parties that the May 17 Order fully alleviates Brownstein's concerns as expressed in my previous letter of today. Accordingly:

- A. Brownstein will be producing all documents contained on its privilege log pursuant the May 17 Order. These documents will be delivered early this afternoon Mountain Time to Gibson, Dunn & Crutcher for distribution to the other parties.
- B. Mr. McDermott will testify on May 21 pursuant to the May 17 Order, which Brownstein interprets as relieving it of all obligations to interpose objections to the disclosure of attorney/client privileged and work product information. Mr. McDermott will answer all questions to which the Defendants make no objection based on the assertion of privilege or work product. Should any Defendant interpose a privilege or work product objection, Mr. McDermott will not answer the question to which objection is made until the objection is resolved by the Master or by the Court.

Thank you for your patience and understanding.

Respectfully submitted,

  
Lawrence W. Treece

LWT:mm

cc: Attached List

410 Seventeenth Street, Suite 2200  
Denver, CO 80202-4432  
Tel: 303.223.1100

Brownstein Hyatt Farber Schreck

**Service List**

Randy M. Mastro, rmastro@gibsondunn.com William E. Thomson, wthomson@gibsondunn.com  Counsel for Plaintiff Chevron Corporation	Elliot R. Peters, epeters@kvn.com John W. Keker, jkeker@kvn.com Jan Nielsen Little, jlittle@kvn.com  Counsel for Defendants Steven Donziger, The Law Offices of Steven R. Donziger and Donziger & Associates, PLLC
Stuart A. Krause, skrause@zeklaw.com Benjamin H. Green, bgreen@zeklaw.com  Counsel for Defendants Stratus Consulting, Inc., Ann Maest and Douglas Beltman	Julio C. Gomez, jgomez@gomezllc.com Tyler G. Doyle, tydoyle@skv.com  Counsel for Defendants Hugo Gerardo Camacho Naranjo, Javier Piaguaje Payaguaje
Caroline C. Marino, cmarino@leaderberkon.com  Counsel for Interested Party Patton Boggs LLP	Stephen D. Susman, ssusman@susmangodfrey.com James J. Rohn, jrohn@conradobrien.com  Counsel for Interested Parties Joseph C. Kohn and Kohn Swift & Graf, P.C.
Charles M. Mitchell, cmitchel@winston.com  Counsel for Interested Party Republic of Ecuador	